IN THE UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

RICHARD BREWER, JEAN CAROL	§	
LANE, TEXAS DIVISION SONS OF	§	
CONFEDERATE VETERANS, INC.,	§	
Plaintiffs,	§	
•	8	
ν.	§	5:17-CV-00837-DAE
	8	
RON NIRENBERG, ROBERTO TREVINO,	§	
WILLIAM SHAW, REBECCA VIAGRAN,	§	
REY SALDANA, SHIRLEY GONZALES,	§	
GREG BROCKHOUSE, ANA	§	
SANDOVAL, MANNY PALAEZ, JOHN	8	
COURAGE, and CLAYTON PERRY, In	§	
Their Official Capacities as Members of the	§	
San Antonio City Council	§	
Defendants	§	

<u>DEFENDANTS' RESPONSE TO PLAINTIFFS' MOTION TO FOR LEAVE TO AMEND</u> <u>COMPLAINT</u>

Now come RON NIRENBERG, in his Official Capacity as Mayor of the City of San Antonio, and ROBERT TREVINO, WILIAM SHAW, REBECCA VIAGRAN, REY SALDANA, SHIRLEY GONZALES, GREG BROCKHOUSE, ANA SANDOVAL, MANNY PALAEZ, and JOHN COURAGE, and CLAYTON PERRY, in Their Official Capacities as Members of the San Antonio City Council, and file this their Response to Plaintiffs' Motion to for Leave to Amend Complaint (Dk. #29) and would show unto the Court as follows:

1. Defendants do no oppose leave for Plaintiffs to file a second amended complaint.

Defendants reserve the right to file an amended answer in response to said complaint and failure to oppose the request for leave is not an admission that anything contained therein is substantiated by law or by facts.

WHEREFORE, PREMISES CONSIDERED, DEFENDANTS RON NIRENBERG, in his Official Capacity as Mayor of the City of San Antonio, and ROBERT TREVINO, WILIAM SHAW, REBECCA VIAGRAN, REY SALDANA, SHIRLEY GONZALES, GREG BROCKHOUSE, ANA SANDOVAL, MANNY PALAEZ, and JOHN COURAGE, and CLAYTON PERRY, in Their Official Capacities as Members of the San Antonio City Council, pray this Court deny Plaintiffs' Motion to Inspect in all things, and for such other and further relief, both in law and in equity, to which these Defendants may be entitled.

Respectfully Submitted,

CITY OF SAN ANTONIO
Office of the City Attorney
Litigation Division
Frost Bank Tower
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/s/Deborah Lynne Klein
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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of Court using the CM/ECF system that will send notification of such filing to the following on April 24, 2018:

Kirk David Lyons PO Box 1235 Black Mountain, North Carolina 28711

/s/ Deborah Lynne Klein
DEBORAH LYNNE KLEIN

Defs Resp to Pls' Mt to Leave Amend Complaint *Brewer, et. al. v Nirenberg, et. al.*, Cause No. SA-17-CV-00837-DAE Page 2 of 2